

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**EUGENE DIVISION**

**UNITED STATES OF AMERICA**

**6:19-cr- 504-AA**

**v.**

**INFORMATION**

**TALON WHITE,**

**17 U.S.C. § 506(a)(1)(A)**

**18 U.S.C. § 2319(b)(1)**

**Defendant.**

**26 U.S.C. § 7201**

**Forfeiture Allegation**

**THE UNITED STATES ATTORNEY CHARGES:**

**COUNT 1**

**(Criminal Infringement of Copyright)**

**(17 U.S.C. § 506(a)(1)(A) and 18 U.S.C. § 2319(b)(1))**

Beginning on an unknown date, but starting no later than 2013, and continuing into 2018, in the District of Oregon, defendant **TALON WHITE** did willfully infringe a copyright for purposes of commercial advantage and private financial gain, namely, reproducing and distributing, during a 180-day period, at least 10 copies and phonorecords, of 1 or more copyrighted works, having a total retail value of more than \$2,500,

In violation of Title 17, United States Code, Section 506(a)(1)(A) and Title 18, United States Code, Sections 2319(a) and (b)(1).

**COUNT 2**  
**(Tax Evasion)**  
**(26 U.S.C. § 7201)**

From in or about 2013 through in or about April 2018, in the District of Oregon, defendant **TALON WHITE** willfully attempted to evade and defeat income tax due and owing by him to the United States of America, for the calendar years 2013, 2014, 2015, 2016, and 2017, by preparing and causing to be prepared, and by signing and causing to be signed, for each calendar year, a false and fraudulent U.S. Individual Income Tax Return, Form 1040, which was submitted to the Internal Revenue Service. On each of these tax returns, defendant reported and caused to be reported that his taxable income and amount of tax due and owing were as follows:

	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Taxable					
Income	\$16,205	\$21,684	\$5,223	\$188,765	\$90,331
Tax Due and					
Owing	\$5,972	\$7,855	\$4,548	\$68,375	\$38,869

In fact, as defendant knew, his taxable income for calendar years 2013 through 2017 was greater than the amount reported on each tax return. For calendar years 2013 through 2017, White underreported his income by over \$4,000,000. As a result of such additional taxable income, for each calendar year, there was additional tax due and owing to the United States of America.

In violation of Title 26, United States Code, Section 7201.

**FORFEITURE ALLEGATION**

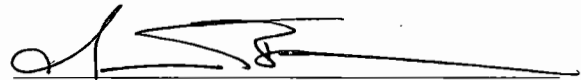
Upon conviction of the offense in Count 1, defendant shall forfeit to the United States, pursuant 18 U.S.C. §§ 981(a)(1)(C), 2323(a)(1)(C) and (b)(1), and 28 U.S.C. § 2461(c), any

property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the aforesaid violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations.

Dated: November \_\_\_\_, 2019

Respectfully submitted,

BILLY J. WILLIAMS  
United States Attorney

A handwritten signature in black ink, appearing to read 'G. Bruce', written over a horizontal line.

GAVIN W. BRUCE, OSB #113384  
Assistant United States Attorney